

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Union Electric Company d/b/a)
Ameren Missouri’s 2015 RES Compliance Report and)
Its 2016-2018 RES Compliance Plan) Case No. EO-2016-0286

**RESPONSE OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS TO RENEW
MISSOURI’S CRITICISM OF AMEREN MISSOURI’S RENEWABLE ENERGY
COMPLIANCE PLAN**

Comes now the Missouri Industrial Energy Consumers (“MIEC”) and files this Response in Support of Ameren Missouri’s Renewable Energy Compliance Report and Plan:

1. Renew Missouri criticizes Ameren Missouri’s calculation of the one percent rate impact for the costs of compliance with the renewable energy standard (“RES”).

2. The MIEC’s lawyers and experts have reviewed the calculation and reviewed the responses of other parties, notably the Commission’s Staff. The MIEC agrees with Ameren Missouri’s calculation and supports Ameren Missouri’s RES Compliance Plan in that regard.

3. Renew Missouri also criticizes Ameren Missouri’s use of renewable energy credits from the Keokuk hydroelectric power plant to demonstrate compliance with the RES. Renew Missouri argues that the combined nameplate capacity of the generators at that plant disqualify its energy production from counting toward compliance with the RES.

4. The MIEC supports Ameren Missouri’s use of credits for the energy generated by that plant. The use of those credits is supported by Missouri statutes and this Commission’s regulations addressing RES compliance.

5. WHEREFORE, the MIEC requests that the Commission approve Ameren Missouri’s RES Compliance Report and Plan.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 29th day of July, 2016, to all parties on the Commission's service list in this case.

/s/ Diana Vuylsteke